

Quarterly Progress Report #28 January/February/March 2020

Ref. No.:

Date:

048041

April 14, 2020

To: Brian Kelly, U.S. EPA

Christopher Black, U.S. EPA Richard Clarizio, U.S. EPA Lori Kozel, Tetra Tech

Licia Yangouyian, City of Dearborn Alan Loebach, City of Dearborn Jeff Watson, City of Dearborn

From: Glopp Turchan Project Co

From: Glenn Turchan, Project Coordinator/kf/28

cc: Anastasia Bremmer, Ford

Bert Richnafsky, Weavertown Grant Gilezan, Dykema Gossett

Re: Removal Action Quarterly Progress Report #28

(January, February, and March 2020)

(Pursuant to Section 92 of the AOC and Section 3.2 of the

Removal Action Work Plan)
Former Dearborn Refining Site

Dearborn, Michigan

A. Due Date: April 14, 2020

B. Previous Activities - January/February/March

- Submitted the Dearborn Refining Site (Site) Quarterly Progress Report #27 for October, November, and December 2019 to the United States Environmental Protection Agency (U.S. EPA), Tetra Tech, Inc. (Tetra Tech), and the City of Dearborn on January 15, 2020.
- Prepared and submitted the sentry well tables to Ferrous Processing and Trading Company (FPT) on January 15, 2020.
- Received the U.S. EPA February 14, 2020 email comments regarding future Quarterly Progress Reports.
- Notified the U.S. EPA and Tetra Tech on March 23, 2020 that the January, February, and March 2020 quarterly monitoring event was scheduled for March 26, 2020.
- The January, February, and March 2020 quarterly operation, maintenance, and monitoring (OMM) activities scheduled for March 26, 2020 were postponed following receipt of the March 23, 2020 Office of the Governor's Executive Order 2020-21 (Covid-19) for Michigan and approval of the





U.S. EPA. The City of Dearborn quarterly Site inspection for January, February, and March 2020 was also postponed.

Prepared and submitted the Response to Comments Memorandum regarding the February 14, 2020
 U.S. EPA future Quarterly Progress Report comments (Response to Comments Memorandum) to the U.S. EPA and Tetra Tech on March 30, 2020.

C. Site Sample Analytical Data

| • | Air Monitoring: | |
|---|-----------------|--|

- None
- Waste Compatibility Analyses:
 - None
- Waste Characterization Analyses:
 - None
- Soil and Groundwater Investigation:
 - None
- ACM Abatement:
 - None

D. Document Submittals/Work Plan Modification

- Submittals:
 - Quarterly Progress Report #27 to the U.S. EPA, Tetra Tech, and the City of Dearborn on January 15, 2020
 - Sentry well tables to FPT on January 15, 2020
 - Response to Comments Memorandum to the U.S. EPA and Tetra Tech on March 30, 2020
- Revision Requests:
 - None
- Work Plan Revisions:
 - None

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E. Issues Identified

- New Issues and Planned Resolution:
 - The U.S. EPA provided comments regarding future Quarterly Progress Reports on February 14, 2020. The Response to Comments Memorandum was prepared to respond to the U.S. EPA comments and was submitted to the U.S. EPA and Tetra Tech on March 30, 2020.
 - The January, February, and March 2020 OMM activities scheduled for March 26, 2020 were postponed following receipt of the March 23, 2020 Office of the Governor's Executive Order 2020-21 (Covid-19) for Michigan and approval of the U.S. EPA. The City of Dearborn quarterly Site inspection for January, February, and March 2020 was also postponed. It is proposed that the January, February, and March 2020 quarterly monitoring event and the April, May, and June 2020 quarterly monitoring event be combined so that one monitoring event is completed in the second quarterly of 2020. The schedule for the next quarterly monitoring event is dependent on future direction provided by the Office of the Governor and the U.S. EPA. The Michigan Governor's stay-at-home Executive Order is in effect until April 30, 2020.
- Previously Identified Issues Pending Resolution:
 - In a letter dated December 7, 2018, the current Site owner (City of Dearborn) provided notice of its intention to sell the Site to The Soave Real Estate Group, Inc., which upon acquiring the Site plans to build a manufacturing facility subject to the recorded Restrictive Covenant and the remaining Administrative Settlement Agreement and Order on Consent (AOC) Site work requirements. No subsequent communications from the City of Dearborn regarding the sale of the Site have been received.
 - Methane vapor

The Site has Passive Ventilation Barriers (PVBs) constructed at the northern and southern Site boundaries, as presented on Figure 1. The PVBs passively vent methane on Site prior to the property boundaries. Methane is generally not detected or measured at very low detections at the eastern and western Site boundaries during the methane monitoring events due to the Site's geology (e.g., clay present near the ground surface in either direction).

The northern PVB has been successful at controlling the methane at the northern Site boundary. The southern PVB is controlling methane migrating from the central portions of the Site. Methane is intermittently detected in the sentry wells during the methane monitoring events.

Methane readings were not collected during the January, February, and March 2020 quarter, as approved by the U.S. EPA on March 23, 2020. Methane will continue to be monitored quarterly and the results will be reported to the U.S. EPA in the Quarterly Progress Reports.

F. Current/Projected Work – April/May/June 2020

Submit Quarterly Progress Report #28 for January, February, and March 2020

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- OMM activities, including:
 - Quarterly monitoring of water and light non-aqueous phase liquid (LNAPL) levels
 - Quarterly methane and gas probe pressure monitoring
- Scheduling:
 - Schedules to adhere to the April 17, 2013 Project Schedule (Revision 11) as approved by the U.S. EPA on May 22, 2013

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